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## **EXPORT CONTROL COMPLIANCE**

### **Qualification Card for Federal Program Managers and Field Office Personnel**

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Name:	Title:	Date Initiated:
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This Qualification Card is designed to serve as a foundational template for Federal Program Managers and Field Office Personnel involved in the oversight and management of programs related to export controls, property management, and national security. It is structured to document the progression of an individual's qualifications, their understanding and application of pertinent federal regulations and guidelines, and the demonstration of their skills across various levels of responsibility.

The readings included in this card encompass essential regulations, orders, and guidelines that provide a comprehensive understanding of the legal and operational frameworks governing federal programs. Participants will engage with these materials to enhance their knowledge and skills in managing sensitive information, ensuring compliance with export controls, and promoting effective stewardship of federal resources.

This document reflects a commitment to maintaining the highest standards of accountability, compliance, and operational efficiency within federal programs. It serves as a valuable resource for professional development, ensuring that personnel are well-equipped to navigate the complexities of their roles while adhering to federal laws and policies.

QUALIFICATIONS	
Training	Certificate Date
<b>High Risk Property (HRP) Awareness (2-hour virtual)</b> —Raises awareness of HRP requirements and responsibilities, introducing HRP, its presence within the U.S. Department of Energy's National Nuclear Security Administration (DOE/NNSA) complex, and strategies for mitigating proliferation risks. Targeted at DOE and contractor personnel involved in the life cycle management of proliferation-sensitive property, the course addresses key roles in property management, procurement, and export control. Go to <a href="https://hrp.doe.gov/Registration/Event">https://hrp.doe.gov/Registration/Event</a> .	
<b>Export Control Awareness (2-hour virtual)</b> —Provides U.S. Government federal employees, their staff, and contractors with an overview of export control responsibilities, emphasizing compliance and the impact of regulations on their programs. Participants will learn about controlled technology and key contacts for assistance in navigating export control requirements. Go to <a href="https://ecap.learning.ornl.gov">https://ecap.learning.ornl.gov</a> or email <a href="mailto:ecap@ornl.gov">ecap@ornl.gov</a> .	
<b>Nonproliferation for High Risk Property Management (3-day in-person)</b> —Covers the fundamentals of U.S. nonproliferation policy and the requirements for handling proliferation-sensitive equipment and materials, with a focus on key aspects of controlled equipment. Participants engage in hands-on exercises, interactive modules, and a capstone exercise to demonstrate their knowledge and skills in the life cycle management of proliferation-sensitive property. Go to <a href="https://hrp.doe.gov/Registration/Event">https://hrp.doe.gov/Registration/Event</a> .	
<b>Export Controlled Information (ECI) Workshop (2-day in-person)</b> —Provides U.S. Government federal employees, their staff, and contractors with a foundational understanding of U.S. nonproliferation policy and export control regulations, focusing on reviewing, handling, and marking proliferation-sensitive information and ECI. Participants engage in detailed regulatory reviews, hands-on exercises, and interactive modules to enhance their knowledge and skills in managing controlled technology. Go to <a href="https://ecap.learning.ornl.gov">https://ecap.learning.ornl.gov</a> or email <a href="mailto:ecap@ornl.gov">ecap@ornl.gov</a> .	

Recommended Reading for Detailed Background	
<b>NNSA Policy Letter, NAP-23, Atomic Energy Act Control of Import and Export Activities -</b> <i>Outlines the procedures for controlling import and export activities related to atomic energy under the Atomic Energy Act, detailing the regulatory framework for compliance.</i>	
<b>Export Administration Regulations (EAR) 15 CFR 730-774 -</b> <i>Governs the export and re-export of commercial and dual-use goods, technology, and software from the United States to ensure national security and foreign policy objectives are met.</i>	
<b>International Traffic in Arms Regulations (ITAR) 22 CFR 120-130 -</b> <i>Controls the export and import of defense-related articles and services to safeguard U.S. national security and foreign policy interests.</i>	
<b>Department of Energy (DOE) Regulations 10 CFR 810 -</b> <i>Establishes the requirements for the export of unclassified nuclear technology and assistance to ensure compliance with U.S. nonproliferation policies and national security objectives.</i>	
<b>Nuclear Regulatory Commission (NRC) 10 CFR 110 -</b> <i>Governs the export and import of nuclear materials and equipment to ensure the safe and secure use of nuclear technology in compliance with U.S. laws and international agreements.</i>	
<b>Foreign Assets Control Regulations 31 CFR 500-598 -</b> <i>Establishes the legal framework for the U.S. Government's enforcement of economic sanctions and trade restrictions against foreign countries, entities, and individuals to protect national security and foreign policy interests.</i>	
<b>10 CFR 1017 Identification and Protection of Unclassified Controlled Nuclear Information (UCNI) -</b> <i>Establishes the requirements for the identification and protection of Unclassified Controlled Nuclear Information, ensuring that sensitive nuclear-related information is adequately safeguarded to prevent unauthorized disclosure while promoting compliance with national security and regulatory standards.</i>	
<b>DOE Order (DOE O) 551.1D Official Foreign Travel -</b> <i>Outlines the policies and procedures for official foreign travel by Department of Energy employees, emphasizing the need for proper authorization, risk assessment, and compliance with security and reporting requirements to ensure the safety and effectiveness of such travel.</i>	
<b>DOE Order (DOE O) 205.1B Cyber Security Management Program -</b> <i>Outlines the framework for the Cyber Security Management Program within DOE, establishing policies and procedures to protect sensitive information and critical infrastructure from cyber threats while ensuring compliance with federal cybersecurity standards.</i>	
<b>DOE Order (DOE O) 142.3B Foreign Visits and Assignments -</b> <i>Provides guidelines for managing foreign visits and assignments to DOE facilities, focusing on the protection of sensitive information and national security by establishing procedures for screening, approval, and oversight of foreign visitors and assignments.</i>	
<b>DOE Order (DOE O) 241.1B Scientific and Technical Information Management -</b> <i>Establishes policies and procedures for the management of scientific and technical information within DOE, ensuring compliance with federal regulations and promoting effective stewardship of sensitive information.</i>	
<b>DOE Order (DOE O) 471.6 Operations Security (OPSEC) -</b> <i>Establishes policies and procedures for operations security within DOE, ensuring that sensitive information is protected from unauthorized disclosure and that appropriate measures are taken to safeguard national security interests.</i>	
<b>DOE Order (DOE O) 481.1C Strategic Partnership Projects -</b> <i>Outlines the policies and procedures for Strategic Partnership Projects within DOE, facilitating collaboration with external partners to leverage resources and expertise for advancing research, development, and technology transfer while ensuring compliance with applicable laws and regulations.</i>	
<b>DOE Order (DOE O) 482.1 DOE Facilities Technology Partnering Programs (User Facilities) -</b> <i>Establishes the policies and procedures for DOE's Facilities Technology Partnering Programs, also known as User Facilities, promoting collaboration with external entities to enhance access to and utilization of DOE research facilities while ensuring effective management and compliance with relevant regulations.</i>	
<b>DOE Order (DOE O) 483.1 Cooperative Research and Development Agreements (CRADAs) -</b> <i>Outlines the policies and procedures for establishing Cooperative Research and Development Agreements within DOE, facilitating collaboration between DOE and external partners to advance</i>	

research and development while ensuring the protection of intellectual property and compliance with applicable laws.	
<b>DOE Order (DOE O) 484.1 Reimbursable Work for Department of Homeland Security</b> - Establishes the policies and procedures for conducting reimbursable work for the Department of Homeland Security, outlining the framework for collaboration, resource allocation, and financial management to support joint initiatives while ensuring compliance with federal regulations and agreements.	
<b>DOE Acquisition Guide, Chapter 25 Export Controls 48 CFR 925</b> - Provides guidance on compliance with export control laws and regulations in the procurement process, ensuring that DOE acquisitions adhere to national security and foreign policy requirements related to the export of sensitive technologies and information.	
<b>INFCIRC/254/Part 1 and Part 2 NSG Trigger List and Dual-Use List</b> - Outlines the items and technologies that require export controls to prevent the proliferation of nuclear weapons and ensure that dual-use goods are monitored to mitigate risks associated with their potential use in nuclear weapon development.	
Other export control regulations for the ATF, EPA, DOA, FDA, etc.	
International Regimes/Treaties, Agreements such as MTCR, AG, WA, NPT	

The following informational training courses/workshops are supplemental, but available for those desiring more detailed instruction.

Course Descriptions	Certificate Date
<b>Department of Commerce: Complying with U.S. Export Controls</b> (1–2 day)—Core courses on the Export Administration Regulations (EAR) as well as in-depth courses on special topics of interest to the exporting community. Instructors are experienced export administration and regulatory policy specialists, engineers and enforcement personnel from the Bureau of Industry and Security's (BIS's) Washington, DC, headquarters, and field offices, as well as representatives from other U.S. Government agencies as appropriate. Go to <a href="https://www.bis.doc.gov/index.php/compliance-a-training/export-administration-regulations-training">https://www.bis.doc.gov/index.php/compliance-a-training/export-administration-regulations-training</a> .	
<b>Department of State: International Traffic in Arms Regulations (ITAR) Basics or the Society for International Affairs (SIA) Basics Conference (or similar)</b> —Designed for newcomers to export licensing. Participants receive a comprehensive, step-by-step guide on exporting articles on the U.S. Munitions List and the Commerce Control List, including insights into the license application process and requirements from the Departments of State and Commerce.	
<b>Department of Commerce: Technology Controls</b> —Presents the challenges with technology controls and effective strategies for export compliance programs. Go to <a href="https://www.bis.doc.gov/index.php/compliance-a-training/current-seminar-schedule">https://www.bis.doc.gov/index.php/compliance-a-training/current-seminar-schedule</a> .	
<b>Department of Commerce: Creating an Effective Export Compliance Program</b> (video)—Presents the elements of an effective export compliance program for EAR, administered and enforced by the Bureau of Industry and Security.	
Various DOE/NNSA sponsored nonproliferation courses (as applicable): <a href="https://cvent.me/zrLQB1">https://cvent.me/zrLQB1</a> If you have difficulty opening the Workshop Series Flyer link, please contact Cathy Bynum at <a href="mailto:cbynum@anl.gov">cbynum@anl.gov</a> for an emailed flyer.	

For questions, please contact the ECAP team at [ecap@ornl.gov](mailto:ecap@ornl.gov).

04/2025